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February 22, 2022

VIA ECF

Hon. Joanna Seybert
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Perrong v. Charles Baratta LLC, et al.*
Civil Action No: 2:21-cv-00996-JS-AYS
RR File No.: 2788-12

Dear Judge Seybert,

We represent defendant Fleming Nolen & Jez LLP in the above-referenced matter. We write in response to the February 18, 2022, letter by Laura Kogan (Doc. 83), counsel for the co-defendants, requesting a stay of the case deadlines and an adjournment of the dispositive motion briefing deadlines (Doc. 79). Fleming Nolen & Jez LLP has no objection to Ms. Kogan's request as it relates to plaintiffs and co-defendants, but my client opposes any stay of the proceedings as it relates to their motion to dismiss for lack of personal jurisdiction, which was filed today (Docs. 84-87). There is no reason for the Court to stay the briefing and decision on my client's motion to dismiss while plaintiffs and co-defendants participate in private mediation. Thank you for your consideration.

Very truly yours,

RIVKIN RADLER LLP

A handwritten signature in black ink, appearing to read 'J Bruno', written over a light blue horizontal line.

Jonathan B. Bruno

cc: All parties via ECF